

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Trustees of the Regional Council of)	
Carpenters Pension Fund, Welfare Fund)	
and Apprentice & Trainee Program Fund,)	No. 08 C 359
)	
v.)	Judge Gottshcall
)	
Longshore/Daly, Inc.)	

Motion to Extend Time to Respond

NOW COMES Longshore/Daly, Inc. through its attorneys, Anderson & Moore, P.C., and respectfully requests the entry of an order extending the time to file its answer and in support thereof states:

1. Longshore/Daly, Inc. is an Illinois corporation whose registered agent is the undersigned attorney.
2. Summons was served upon Thomas S. Moore as registered agent for Longshore/Daly, Inc. on January 31, 2008.
3. Longshore/Daly's answer is due February 20, 2008.
4. Longshore/Daly, Inc. is in the process of gathering documents and payment histories necessary to formulate an answer.
5. Thomas S. Moore is scheduled to be out of the country from February 15, 2008 through February 24, 2008 and will be unable to review any documents until his return.

WHEREFORE, Longshore/Daly respectfully requests an additional twenty-one days in

which to file its answer.

Respectfully Submitted,

/s/ Thomas S. Moore
One of the Attorneys for
Longshore/Daly, Inc.

Thomas S. Moore
Jane F. Anderson
Anderson & Moore, P.C.
111 W Washington
Suite 1100
Chicago, IL 60602
(312) 251-1500

Certificate of Service

I hereby certify that on February 19, 2008, I electronically filed the Notice of Motion and

Motion to Extend Time to Respond on behalf of Longshore/Daly, Inc. with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Daniel P. McAnally
Whitfield McGann & Ketterman
111 E Wacker Drive
Suite 2600
Chicago, IL 60601

Respectfully Submitted:

/s/ Thomas S. Moore
Anderson & Moore, P.C.
111 West Washington Street
Suite 1100
Chicago, IL 60602